

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MISSOURI
ST. LOUIS DIVISION

IN RE:) BANKRUPTCY CASE
)
PATRICIA RUHMANN,) NO.: 23-40889-BLCL
)
Debtor.) CHAPTER 13
)
)
)

OBJECTION TO CONFIRMATION

COMES NOW Freedom Mortgage Corporation (hereinafter known as "Creditor"), a secured creditor holding a deed of trust against the real property commonly known as 9811 Eastbrook Dr., Saint Louis, MO 63114 (the "Property"), and for the reasons stated below, objects to confirmation of Debtor's Chapter 13 plan (Doc. No. 15) (the "Plan").

1.

Debtor's Plan underestimates the prepetition arrearage claim owed to Creditor as \$4,000.00. The actual prepetition arrearage amount owed to Creditor as per its Proof of Claim (4-1) filed in this case on May 15, 2023 is \$7,540.86. Confirmation of the Plan should be denied until Debtor amends the Plan to properly treat Creditor's claim.

2.

Creditor reserves the right to raise the failure of Debtor to have made post-petition mortgage payments if at the time of the confirmation hearing that appears to be the case.

WHEREFORE, Creditor prays that the Court will:

1. deny confirmation,
2. award reasonable attorney's fees, and
3. grant such other and further relief as is just and equitable.

/s/Linda St. Pierre

Linda St. Pierre

Missouri BAR NO.

Attorney for Creditor

McCalla Raymer Leibert Pierce, LLC

1544 Old Alabama Road

Roswell, GA 30076

860-240-9156

Bankruptcy Case No.: 23-40889

Chapter: 13

CERTIFICATE OF SERVICE

I, Linda St. Pierre, of MCCALLA RAYMER LEIBERT PIERCE, LLC, 1544 Old Alabama Road, Roswell, GA 30076, certify:

That I am, and at all times hereinafter mentioned, was more than 18 years of age;

That on the date below, I served a copy of the within OBJECTION TO CONFIRMATION filed in this bankruptcy matter on the following parties at the addresses shown, by regular United States Mail, with proper postage affixed, unless another manner of service is expressly indicated:

Patricia Ruhmann
9811 Eastbrook Dr
Saint Louis, MO 63114

Timothy Patrick Powderly
The Powderly Law Firm, L.L.C.
11965 St. Charles Rock Rd.
Suite 202
St. Louis, MO 63044

(served via ECF Notification)

Diana S. Daugherty, Trustee
Chapter 13 Trustee
P.O. Box 430908
St. Louis, MO 63143

(served via ECF Notification)

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on: 06/01/2023
(date)

By: /s/Linda St. Pierre
Linda St. Pierre
Missouri BAR NO.
Attorney for Creditor